E911 Phase II Implementation Report

Tennessee Cellular Telephone Company ("TCTC"), call sign KNKR257, hereby submits its report on its plans for implementing Phase II enhanced 911 service, pursuant to Section 20.18(i) of the Commission's Rules, 47 C.F.R. §20.18(i); the Commission's *Fourth Memorandum Opinion and Order*, FCC 00-326, released September 8, 2000, in CC Docket No. 94-102; and *Public Notice*, DA 00-2099, released September 14, 2000, in CC Docket No. 94-102.

Carrier Identifying Information:

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E911 Phase II Location Technology Information:

Type of Technology:

TCTC intends to employ a handset-based solution. At this time, it does not appear that any practical network-based solution will be commercially available to carries of TCTC's size and scope. TCTC is a small operator, too small to purchase its equipment directly from manufacturers. TCTC usually purchases equipment from wholesale distributors, and intends to acquire handsets employing ALI technology from a wholesale distributor. TCTC intends to use whatever ALI-capable handsets are available from the wholesale distributor.

Implementation; Existing Handsets; Schedule:

In the initial phases of the deployment schedule, the use of handset-based ALI technology will: (i) require TCTC's current customers to replace their handsets with more expensive ALI-capable handsets, if they want the enhanced 911 service, and (ii) require new customers to purchase more expensive handsets employing ALI technology. In the later phases of the deployment schedule, when the interim penetration benchmarks increase significantly, the use of handset-based ALI technology will, in all probability, require handset upgrades as well.

One of the wholesale distributors with which TCTC regularly does business advises that it expects to have one ALI-capable handset model available by the latter half of 2001, but that it will

not have any other ALI-capable handset models available before 2003 or 2004. This wholesale distributor also advises that the handsets available in 2001 will be very expensive.

TCTC intends to comply with the FCC's penetration benchmarks. However, TCTC also anticipates that ALI-capable handsets will be made available to larger operators first, and that the wholesale distributors will have only limited supplies of ALI-capable handsets. Thus, there may not be a sufficient supply of ALI-capable handsets to meet TCTC's needs. If and when other E911 equipment becomes available, TCTC will consider acquiring same.

If TCTC is required to make any changes in its implementation plans, it will notify the Commission of same within thirty days of the adoption of any changes, as required by Section 20.18(i) of the Commission's Rules.

Testing and Verification:

TCTC intends to verify conformance with the Phase II accuracy requirements by acquiring handsets that the manufacturers represent are accurate within the limits specified by the Commission's Rules. TCTC will rely on information received from its wholesale distributors that provides some assurance that the manufacturers are offering ALI-capable handsets that comply with the accuracy rules. Additionally, TCTC intends to follow the guidelines in OET Bulletin No. 71 for determining the accuracy of its ALI solution.

Location of Roamers:

TCTC should be able to provide incoming roamers the same location information it provides to its own customers with ALI-capable handsets, provided such incoming roamers have handsets that employ CDMA and ALI technology. Even if TCTC is not able to find the exact location of a roamer, it should, at least, be able to locate the cell site with which the roamer is connected.